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13 HILLARD M. STERLING, ESQ. and
14 FREEBORN & PETERS, LLP

15 ADVANCED MULTILEVEL
16 CONCEPTS, INC. and ABLE DIRECT
17 MARKETING,

18 Plaintiff,

19 v.

20 STALT, INC., HILLARD M. STERLING,
21 ESQ., FREEBORN & PETERS, LLP and
22 DOES 1 through 30, inclusive,

23 Defendant.

24 Case No. CV-11-6679 SC

25 **STIPULATION AND [PROPOSED]
26 ORDER RE: FRCP 26 INITIAL
27 DISCLOSURES AND ADR STIPULATION**

28 Courtroom: 1
Judge: Hon. Samuel Conti
Action Filed: December 28, 2011

1 **I. INTRODUCTION**

2 By this stipulation, the parties jointly seek to extend the deadline to complete initial
 3 disclosures and file the Rule 26(f) Report from April 4, 2012 to Friday, May 25, 2012 and the
 4 deadline to file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference
 5 from March 21, 2012 to May 25, 2012.

6 **II. REASONS FOR STIPULATION**

7 Good cause exists for this stipulation because the Court set two dispositive motions filed
 8 by Hillard M. Sterling and Freeborn & Peters, LLP for Friday, May 4, 2012. Following the
 9 Court's ruling on these motions, the parties will better understand which parties and claims will
 10 remain in this case going forward. As of today, the Court has not rescheduled the Initial Case
 11 Management Conference previously set for April 11, 2012 in front of Magistrate Ryu.

12 **III. DISCLOSURE OF PREVIOUS TIME MODIFICATIONS**

13 There have been no previous extensions of time requested related to the parties' deadlines
 14 to make initial disclosures, file a Rule 26(f) report, or file either Stipulation to ADR Process or
 15 Notice of Need for ADR Phone Conference.

16 **IV. EFFECT OF TIME MODIFICATION ON THE SCHEDULE OF THE CASE**

17 The parties' proposed order should not affect the schedule of the case. On March 9, 2012,
 18 the case was reassigned to this Court. That reassignment vacated the April 11, 2012 Initial Case
 19 Management Conference that had been set by the Hon. Donna Ryu. It appears from reviewing
 20 the docket that no Order Setting Initial Case Management Conference in front of the Hon. Samuel
 21 Conti has been entered by this Court yet.

22 **V. STIPULATION**

23 Plaintiffs Advanced Multilevel Concepts, Inc. and Able Direct Marketing, Defendant
 24 Stalt, Inc., and Defendants, Hillard M. Sterling and Freeborn & Peters, LLP, hereby stipulate to
 25 extend the deadline to complete initial disclosures and file the Rule 26(f) Report to Friday, May
 26 25, 2012.

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28 STIPULATION AND [PROPOSED] ORDER RE: FRCP 26 INITIAL DISCLOSURES AND ADR STIP.
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1 The parties further agree to file either Stipulation to ADR Process or Notice of Need for
2 ADR Phone Conference by May 25, 2012.

3 DATED: March 26, 2012
4

5 By: /s/
6 CARLOS DUQUE
7 Attorney for Plaintiffs
8 ADVANCED MULTILEVEL
9 CONCEPTS, INC. and ABLE DIRECT
10 MARKETING

11 DATED: March 26, 2012
12

13 By: /s/
14 RICHARD GIVENS
15 Attorney for Defendant
16 STALT, INC.

17 LONG & LEVIT LLP
18

19 DATED: March 26, 2012
20

21 By: /s/
22 JOSEPH P. MCMONIGLE
23 KATHLEEN M. EWINS
24 JOHN B. SULLIVAN
25 Attorneys for Defendants
26 HILLARD M. STERLING, ESQ. and
27 FREEBORN & PETERS, LLP
28

[PROPOSED] ORDER

The proposed stipulation is GRANTED.

The deadline for all parties to complete initial disclosures and file the Rule 26(f) Report is Friday, May 25, 2012. The parties shall file either Stipulation to ADR Process or Notice of Need for ADR Process by May 25, 2012.